

### REMARKS

At the outset, the Examiner is thanked for the thorough review and consideration of the pending application. The Office Action dated December 16, 2005 has been received and its contents carefully reviewed.

By this Response, claim 1 has been amended. No new matter has been added. Claims 1-30 are pending in the application with claims 16-30 being withdrawn from consideration. Reconsideration and withdrawal of the rejections in view of the above amendments and the following remarks are respectfully requested.

In the Office Action, claims 1-3 and 5-13 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Applicants Related Art (ARA) in view of U.S. Publication No. 2002/0053701, issued to Kong et al. (hereafter "Kong"). Applicants respectfully traverse the rejection because neither ARA nor Kong, analyzed alone or in any combination, teaches or suggests the combined features recited in the claims of the present application. In particular, ARA and Kong fail to teach a liquid crystal display having an applied horizontal electric field that includes "a passivation film that surrounds and exposes an entire upper surface of the gate pad, the data pad and the common pad" as recited in independent claim 1 of the present application.

The Office Action concedes that ARA does not teach "a passivation film exposing at least one of the gate pad, the data pad and common pad". To remedy the deficient teachings of ARA, the Office Action relies upon the teachings of FIG. 11B of Kong. Based upon the teachings in FIG. 11B, the Office Action concludes that it would have been obvious to modify the device of ARA with the teachings of FIG. 11B of Kong to obtain a device having the combined features recited in the claims of the present application. Applicants respectfully disagree.

Kong discloses a thin film transistor array substrate in which a protection layer 70 is deposited on the gate insulation layer 30. Further, a contact hole 74 exposes the gate pad 24 (see, FIG. 11B and paragraphs [0078 - 0079]). However, Applicants submit Kong fails to teach

“a passivation film that surrounds and exposes an entire upper surface of the gate pad, the data pad and the common pad” as recited in independent claim 1 of the present application.

Because Kong fails to teach at least this feature of claim 1, Kong fails to remedy the deficient teaching of ARA. Accordingly, no combination of ARA and Kong would provide all the features recited in independent claim 1 of the present application. As such, claim 1 and its dependent claims 2-3 and 5-13 are allowable over any combination of ARA and Kong. Reconsideration and withdrawal of the rejection are respectfully requested.

In the Office Action, claims 1 and 13-15 are rejected under 35 U.S.C. § 103(a) as being unpatentable over PCT publication number WO 03/001606, issued to Byun et al. (hereafter “Byun”) in view of Kong. Applicants respectfully traverse the rejection because neither Byun nor Kong, analyzed alone or in any combination, teaches or suggests the combined features recited in the claims of the present application. In particular, Byun and Kong fail to teach a liquid crystal display having an applied horizontal electric field that includes “a passivation film that surrounds and exposes an entire upper surface of the gate pad, the data pad and the common pad” as recited in independent claim 1 of the present application.

The Office Action concedes that Byun “does not specifically disclose a passivation film surrounding and completely exposing at least a data/gate pad”. To remedy this deficient teaching of Byun, the Office Action relies upon Kong. Applicants have discussed above how Kong fails to teach this feature. Because Kong does not teach the deficient teaching of Byun, no combination of Byun and Kong would provide a liquid crystal display having all the features recited in the claims of the present application. Specifically, no combination of Byun and Kong would provide “a passivation film that surrounds and exposes an entire upper surface of the gate pad, the data pad and the common pad” as recited in independent claim 1 of the present application. As such, claim 1 and its dependent claims 13-15 are allowable over any combination of Byun and Kong. Reconsideration and withdrawal of the rejection are respectfully requested.

In the Office Action, claims 2 and 3 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Byun in view of Kong and further in view of PCT publication number WO 03/036374, issued to Lee et al. (hereafter “Lee”) and U.S. Publication No. 2002/0067455, issued

to Komatsu (hereafter “Komatsu”). Applicants traverse the rejection because neither Byun, Kong, Lee nor Komatsu, analyzed alone or in any combination, teaches or suggests the combined features recited in the claims of the present application. In particular, Byun, Kong, Lee and Komatsu fail to teach a liquid crystal display having an applied horizontal electric field that includes “a passivation film that surrounds and exposes an entire upper surface of the gate pad, the data pad and the common pad” as recited in independent claim 1 of the present application.

Applicants have discussed above the deficient teachings of Byun and Kong and submit neither Lee nor Komatsu remedy the deficient teachings of Byun and Kong. Lee discloses a thin film transistor array panel including a passivation layer covering “the data line assembly, the storage capacitor conductive patterns and the semiconductor pattern. First and second contact holes are formed at the passivation layer while exposing the drain electrodes and the storage capacitor conductive patterns.” (See, Abstract). And, Komatsu discloses an in-plane switching mode liquid crystal display device that includes a passivation layer 120 formed over the TFT and data electrode (see, paragraph [0042], FIG. 2C).

However, neither Lee nor Komatsu teach “a passivation film that surrounds and exposes an entire upper surface of the gate pad, the data pad and the common pad” as recited in independent claim 1 of the present application. As such, Lee and Komatsu fail to remedy the deficient teachings of Byun and Kong. Accordingly, claims 2 and 3, which depend from independent claim 1, are allowable over any combination of Byun, Kong, Lee and Komatsu. Reconsideration and withdrawal of the rejection are respectfully requested.

In the Office Action, claim 4 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Byun, Kong and Komatsu further in view of JP 2003-195784, issued to Chiyabara (hereafter “Chiyabara”). Applicants respectfully traverse the rejection because Chiyabara is not valid prior art against the claims of the present application. The present application serial number 10/815,843 claims priority to Korean Application No. P03-21116, filed April 3, 2003. The publication date of Chiyabara is July 9, 2003, which is antedated by the April 3, 2003 filing date of Korean Application P03-21116. To perfect this claim for priority, Applicants file herewith a certified English translation of Korean Application No. P03-2111.

The Office Action concedes that Byun, Kong and Komatsu fail to teach the features recited in claim 4. Because Chiyabara is not valid prior art against the claims of the present application and Byun, Kong and Komatsu fail to teach the features recited in claim 4, Applicants submit claim 4 is allowable over Byun, Kong, Komatsu and Chiyabara.

Further, Applicants submit claim 4, by virtue of its dependence from independent claim 1 is allowable over Byun, Kong, Komatsu and Chiyabara for the same reasons set forth above with respect to independent claim 1. Reconsideration and withdrawal of the rejection are respectfully requested.

Applicants believe the foregoing amendments and remarks place the application in condition for allowance and early, favorable action is respectfully solicited.

If for any reason the Examiner finds the application other than in condition for allowance, the Examiner is requested to call the undersigned attorney at (202) 496-7500 to discuss the steps necessary for placing the application in condition for allowance. All correspondence should continue to be sent to the below-listed address.

If these papers are not considered timely filed by the Patent and Trademark Office, then a petition is hereby made under 37 C.F.R. §1.136, and any additional fees required under 37 C.F.R. §1.136 for any necessary extension of time, or any other fees required to complete the filing of this response, may be charged to Deposit Account No. 50-0911. Please credit any overpayment to deposit Account No. 50-0911. A duplicate copy of this sheet is enclosed.

Dated: March 16, 2006

Respectfully submitted,

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Application No.: 10/815,843  
Amendment dated March 16, 2006  
Reply to Office Action dated December 16, 2005



Docket No.: 8733.1047.00

The Office Action concedes that Byun, Kong and Komatsu fail to teach the features recited in claim 4. Because Chiyabara is not valid prior art against the claims of the present application and Byun, Kong and Komatsu fail to teach the features recited in claim 4, Applicants submit claim 4 is allowable over Byun, Kong, Komatsu and Chiyabara.

Further, Applicants submit claim 4, by virtue of its dependence from independent claim 1 is allowable over Byun, Kong, Komatsu and Chiyabara for the same reasons set forth above with respect to independent claim 1. Reconsideration and withdrawal of the rejection are respectfully requested.

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